

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IRON MOUNTAIN INCORPORATED;
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.; C. RICHARD
REESE; JOHN F. KENNY, JR.; GARRY
B. WATZKE; LARRY L. VARN; and
CHARLES G. MOORE,

Plaintiffs and
Counter-Defendants,

V.

THOMAS CARR,

Defendants and
Counter-Plaintiff.

IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.,

Plaintiff,

V.

SYSTRANS FREIGHT SYSTEMS, INC.,

Defendant.

Civil Action No.
05 10890 RCL

Civil Action No.
05 10999 RCL

**MOTION PURSUANT TO LOCAL RULE 83.5.3 FOR ADMISSION
OF KEVIN M. COLMEY, ESQUIRE *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, Lisa M. Hodes, Esquire, of Sullivan & Worcester LLP, attorneys for Plaintiffs and Counter-Defendants Iron Mountain Incorporated, Iron Mountain Information Management, Inc., C. Richard Reese, John F. Kenny, Jr., Garry B. Watzke, Larry L. Varn and Charles G. Moore (together, “Plaintiffs”), and a member in good standing of the bar of the United States District Court for the District of Massachusetts, hereby moves that Kevin M.

Colmey be permitted to represent Plaintiffs in this case. As grounds for this Motion, Attorney Lisa M. Hodes states as follows:

1. As witnessed by the Affidavit of Kevin M. Colmey, attached hereto as Exhibit A and incorporated herein, I understand that Kevin M. Colmey has been admitted to practice before all courts of record in the State of New York and the District of Columbia, the United States District Courts for the Western District of New York, the District of Columbia and for the District of Maryland, and the United States Court of Appeals for the Fourth Circuit.

2. As witnessed by the Affidavit of Kevin M. Colmey, attached hereto as Exhibit A and incorporated herein, I understand Kevin M. Colmey is a member in good standing in each jurisdiction where he has been admitted to practice and there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction.

3. As witnessed by the Affidavit of Kevin M. Colmey, attached hereto as Exhibit A and incorporated herein, I understand Kevin M. Colmey has familiarized himself with the Local Rules of the U.S. District Court for the District of Massachusetts.

Dated: September 21, 2006

/s/ Lisa M. Hodes
Lisa M. Hodes (BBO #660444)
Lhodes@sandw.com
SULLIVAN & WORCESTER LLP
One Post Office Square
Boston, Massachusetts 02109
(617) 338-2800

Attorneys for Plaintiffs

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 21, 2006.

/s/ Kevin M. Colmey
Kevin M. Colmey

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IRON MOUNTAIN INCORPORATED;)	
IRON MOUNTAIN INFORMATION)	
MANAGEMENT, INC.; C. RICHARD)	
REESE; JOHN F. KENNY, JR.; GARRY)	
B. WATZKE; LARRY L. VARN; and)	Civil Action No.
CHARLES G. MOORE,)	05 10890 RCL
)	
Plaintiffs and)	
Counter-Defendants,)	
)	
v.)	
)	AFFIDAVIT OF KEVIN M. COLMEY
THOMAS CARR,)	
)	
Defendants and)	
Counter-Plaintiff.)	
)	
IRON MOUNTAIN INFORMATION)	
MANAGEMENT, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	05 10999 RCL
SYSTRANS FREIGHT SYSTEMS, INC.,)	
)	
Defendant.)	

STATE OF MASSACHUSETTS)
) ss.
COUNTY OF SUFFOLK)

KEVIN M. COLMEY, being duly sworn, deposes and says:

1. I am an associate in the Boston office of Sullivan & Worcester LLP, One Post Office Square, Boston, MA 02109. I offer this affidavit in support of Plaintiffs' unopposed motion for my Admission *pro hac vice* in this matter.

2. I am a member in good standing of the Bars of New York and the District of Columbia. I am also admitted to practice and am in good standing in the United States District Courts for the Western District of New York (since 2003), the District of Columbia (since 2003), the District of Maryland (since 2004), and the United States Court of Appeals for the Fourth Circuit (since 2004).

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, your affiant respectfully requests that he be permitted to appear *pro hac vice* as counsel and advocate for the aforementioned Plaintiffs.

Dated: September 21, 2006

/s/ Kevin M. Colmey
Kevin M. Colmey

Sworn to before me this
_____ day of September, 2006

Notary Public
My commission expires _____

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LOCAL RULE 7.1(A)(2) CERTIFICATION

Counsel for the Plaintiffs hereby certify that, pursuant to Local Rule 7.1(A)(2), we contacted counsel for the Defendant, Courtney E. Sheehan, Esquire, by phone on September 21st in a good faith attempt to confer to resolve or narrow the issues presented by the attached Motion Pursuant to Local Rule 83.5.3 for Admission of Kevin M. Colmey, Esquire *Pro Hac Vice*.

Ms. Sheehan stated that she had no objection to the Motion Pursuant to Local Rule 83.5.3 for Admission of Kevin M. Colmey, Esquire *Pro Hac Vice*.

Dated: September 21, 2006

/s/ Lisa M. Hodes
Lisa M. Hodes (BBO #660444)
Lhodes@sandw.com
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Boston, Massachusetts 02109
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